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20 *Signify North America Corporation*
21 *and Signify Holding B.V.*

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SIGNIFY NORTH AMERICA CORPORATION and
SIGNIFY HOLDING B.V.

Plaintiffs,

v.

LEPRO INNOVATION INC,
LE INNOVATION INC,
INNOVATION RULES INC.,
HOME EVER INC., and
LETIANLIGHTING, INC.,

Defendants.

Case 2:22-cv-02095-JAD-DJA

**NOTICE OF ORDERS
DENYING PRO HAC VICE
APPLICATION OF
NICHOLAS A. BROWN IN
OTHER MATTERS (ECF 55)**

1 Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively,
2 “Signify”) hereby provide the Court with Notice of the Orders Denying the *Pro Hac Vice*
3 Applications of Nicholas A. Brown (attached hereto as Exhibits A and B) referenced in Mr.
4 Brown’s Verified Petition for Permission to Practice in this Case (“Petition”) (ECF 55). This
5 Notice is made to provide the Court with information relevant to the Petition that Plaintiffs believe
6 was incomplete or omitted from the Petition to aid the Court in assessing the Petition.

7 In his Petition, Mr. Brown acknowledges that his admission *pro hac vice* was denied or
8 withdrawn by the U.S. Patent Trial and Appeal Board (“PTAB”) in 10 Patent IPR proceedings,
9 because he did not disclose the public reproof he received from the State Bar of California in
10 connection with a 2004 California misdemeanor conviction.¹ In summarizing the Board’s orders,
11 denying and withdrawing admission, Mr. Brown states only that the “Board found [his]
12 interpretation of the Board’s rules as not requiring the disclosure of that [California Bar] reproof
13 was unreasonable”.²

14 A true and correct copy of the referenced Order denying Mr. Brown’s *pro hac vice*
15 admission is attached to this Notice as Exhibit A.³ This Order gives a more complete explanation
16 than that set forth in the Petition. Pursuant to the Order, the Board denied and withdrew Mr.
17 Brown’s *pro hac vice* not merely because it found his interpretation of the Board’s requirement to
18 disclose his prior sanction unreasonable, but “[b]ecause Mr. Brown chose to make a false
19 statement in his Declaration in Support of Petitioner’s Motion for *Pro Hac Vice* Admission that
20 ‘[n]o sanction or contempt citation had been imposed against me by any court or administrative
21 body’.”⁴

24 ¹ ECF 55, at 10.

25 ² *Id.*

26 ³ Order for Denying Petitioner’s Motion for Pro Hac Vice Admission of Nicholas A. Brown, *Satco Prods., Inc., v.*
27 *Seoul Semiconductor Co., Ltd.*, IPR 2020-00836 (PTAB, Feb. 16, 2021), attached hereto as Exhibit A.

28 ⁴ *Id.*, at 5.

1 Mr. Brown subsequently filed a Request for Rehearing of the Board's Order Denying his
2 *pro hac vice* application. A true and correct copy of Order Denying the Request for Rehearing is
3 attached hereto as Exhibit B.⁵ The Board denied that Request as well.⁶

4 Dated: August 23, 2023

5 Respectfully submitted,

6 /s/ F. Christopher Austin

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27 *Signify Holding B.V.*

28 ⁵ Order Denying Petitioner's Request for Rehearing, *Satco Prods., Inc., v. Seoul Semiconductor Co., Ltd.*, IPR 2020-00836 (PTAB, Sep. 23, 2021), attached hereto as Exhibit B.

⁶ *Id.*, at 5.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on August 23, 2023, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's EM/ECF system, and parties may access this filing through the Court's CM/ECF system.

/s/ F. Christopher Austin
An employee of Weide & Miller, Ltd.